



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10

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OFFICE OF
ECOSYSTEMS, TRIBAL AND
PUBLIC AFFAIRS

September 22, 2014

Michael L. Balboni
Forest Supervisor
Okanogan-Wenatchee National Forest
215 Melody Lane
Wenatchee, Washington 98801

Re: Comments on Bailey, Aeneas, Revis and Tunk Livestock Grazing Analysis
Final Environmental Impact Statement (EPA Region 10 Project Number: 12-0027-AFS).

Dear Mr. Balboni:

In accordance with our responsibilities under Section 309 of the Clean Air Act, National Environmental Policy Act, and the Council on Environmental Quality regulations for implementing NEPA, the U.S. Environmental Protection Agency has reviewed your Final Environmental Impact Statement for the proposed **Bailey, Aeneas, Revis and Tunk (BART) Livestock Grazing Analysis** on Tonasket Ranger Districts of the Okanogan-Wenatchee National Forest in Okanogan County, Washington.

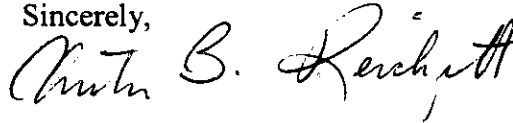
In our comments on the draft EIS in May 2014, the EPA expressed environmental concerns about the proposed project due to its potential impacts to riparian resources and water quality, particularly in streams downstream of the analysis area, which are on the 303(d) list due to violations of water quality standards for bacteria, dissolved oxygen, and pH. We recommended early actions to address streams currently functioning at risk, including actions to increase shade and improve hydrologic functioning of streams, and protect degraded riparian areas. Because of these concerns, we identified Alternative 3 as the environmentally preferable alternative for this project because actions in this alternative would occur early and exclude grazing from overgrazed and heavily trampled areas around streams, thus accelerating riparian resource recovery and streambank stability in those areas than other alternatives.

The draft Record Of Decision (ROD) identifies Alternative 2, Proposed Action, as the selected alternative. This decision is based primarily on the flexibility Alternative 2 would offer permittees to have a role in the decision to implement administrative and adaptive management measures to achieve desired resource results. While we believe this project will contribute to the overall range and forest health, and benefit permittees and other communities in the project area and vicinity, we have remaining concerns that the trajectory to recovery may be slower than if some of the early actions in Alternative 3 had been taken. We are encouraged that the draft ROD includes mitigation, implementation, and effectiveness monitoring measures to meet the Forest Plan and resource objectives. We recommend that the final ROD identify financial resources expected to fund such measures.

Although the FEIS did not include responses to public comment, we note with appreciation that responses are posted on the project web site. We appreciate inclusion of additional clarifying information and commitments to coordinate with both federal and state agencies to ensure water quality standards and endangered species requirements are met. Your responses to our comments largely address our concerns.

Thank you for the opportunity to review this FEIS. If you have questions concerning this review, please contact me at (206) 553-1601 or by electronic mail at reichgott.christine@epa.gov or contact Theogene Mbabaliye of my staff at (206) 553-6322 or by electronic mail at mbabaliye.theogene@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Christine B. Reichgott". The signature is fluid and cursive, with the first name "Christine" written in a larger, more prominent script than the last name "Reichgott".

Christine B. Reichgott, Manager
Environmental Review and Sediment Management Unit